

## **Exhibit "8"**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

AFTER II MOVIE, LLC, ET AL.,

Plaintiffs,

v.

GRANDE COMMUNICATIONS  
NETWORKS, LLC,

Defendant.

No. 1:21-cv-00709-RP

**DEFENDANT'S RESPONSES AND OBJECTIONS TO PLAINTIFFS'  
SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Grande Communications Networks, LLC (“Defendant” or “Grande”), by and through its attorneys, hereby responds to Plaintiffs’ Second Set of Requests for Production of Documents with the following responses and objections.

**GENERAL OBJECTIONS**

The following General Objections are incorporated by reference in each of Defendant’s Specific Objections and Responses set forth below:

1. Defendant objects to Plaintiffs’ Requests to the extent they impose obligations on Defendant that are inconsistent with or exceed those set forth in the Federal Rules of Civil Procedure, Rules of the United States District Court for the Western District of Texas, or any Order of this Court.

2. Defendant objects to Plaintiffs' Requests to the extent they seek the disclosure or production of information protected by the attorney-client privilege and/or work product doctrine. Such information shall not be provided in response to these Requests, and any inadvertent disclosure thereof shall not be deemed a waiver of any privilege or protection with respect to such information or documents.

3. Defendant objects to Plaintiffs' Requests to the extent they seek documents and information from before August 2018, before which any claim is barred by the applicable statute of limitations, 17 U.S.C. § 507(b).

**DEFENDANT'S RESPONSES AND  
OBJECTIONS TO PLAINTIFFS' REQUESTS**

**Request for Production No. 6:** Identify each of the subscribers assigned the Internet Protocol ("IP") addresses at the times listed in attached Exhibits 1-4 and the duration (start and end time) the IP address were assigned to each subscriber.

**Response:** In addition to its General Objections, Defendant objects to this Request as overly broad and unduly burdensome, to the extent it purports to require Grande to investigate subject matter and create documents regarding numerous subscriber accounts. Defendant further objects as the requested information is not proportional to the needs of the case, and it seeks the production of irrelevant information regarding the duration the IP addresses were assigned to each subscriber. Additionally, Defendant objects to this Request to the extent it seeks the production of irrelevant documents that predate April 2017, the earliest date when MEU first sent a copyright infringement notice to Grande relating to any of the works-in-suit, and predates the three-year statute of limitations, which falls on August 13, 2018 (three years before Plaintiffs filed their Complaint on August 13, 2021). This renders the Request overly broad and unduly burdensome as it seeks irrelevant information that predates the issues in dispute in this case.

Grande further objects to this Request based on the Cable Act and any objections filed by Grande and/or a subscriber pursuant to the Court's October 6, 2022 Order relating to the Authorization to Disclose Personally Identifiable Information of Subscribers (ECF No. 53).

Subject to and consistent with these objections, Defendant will produce information regarding the requested subscriber identities in a timely manner in compliance with the Court's October 6, 2022 Order and the resolution of subscriber objections. Depending on the timing of such resolution(s), Defendant may produce documents at a later date reflecting when the relevant IP addresses were assigned to the affected subscribers, to the extent such documents exist and are readily accessible.

Dated: December 12, 2022

By: /s/ Zachary C. Howenstine

Richard L. Brophy\*

Zachary C. Howenstine\*

Margaret R. Szewczyk\*

Angela B. Kennedy\*

Sydney K. Johnson\*

ARMSTRONG TEASDALE LLP

7700 Forsyth Blvd., Suite 1800

St. Louis, Missouri 63105

(314) 621-5070

rbrophy@atllp.com

zhowenstine@atllp.com

mszewczyk@atllp.com

akennedy@atllp.com

skjohnson@atllp.com

\*Admitted Pro Hac Vice

Jacqueline P. Altman

John P. Palmer

NAMAN HOWELL SMITH & LEE

400 Austin Avenue, Suite 800

Waco, TX 76701

254-755-4344

Fax: 254-754-6331

jaltman@namanhowell.com

palmer@namanhowell.com

*Attorneys for Defendant Grande  
Telecommunications Networks LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2022, I caused a copy of the foregoing to be served upon all counsel of record via email.

By: /s/ Zachary C. Howenstine